

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

OLIVIA Y., et al.

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi, et al.

DEFENDANTS

**LIST OF SUBSTITUTE CITATIONS IN
PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION FOR
CONTEMPT AND FOR THE APPOINTMENT OF A RECEIVER**

Page Number	Original Citation	Substitute Citation
6 n.4	the Declaration of Shirim Nothenberg at ¶¶ 88-96 (attached as Exhibit E)	Exhibits 5-17 to the Declaration of Jessica Polansky (attached as Exhibit B and filed under seal)
14	Nothenberg Decl ¶¶ 16-20	Pls.' Mem. of Law in Support of Mot. For Summ. J. on Liability ("Pls.' Mem. for Summ. J.") Ex. 1 at i, 3, 25-26; Ex. 4 at 1-5; Ex. 12 at DHS 020088; Ex. 27 at 102:4-103:16
14	<i>Id.</i> ¶¶ 20, 32-35	Am. Compl. [Doc. No. 25] ¶¶ 162, 182, 183; Pls.' Mem. for Summ. J. Ex. 1 at i, ii, 3, 25-26; Ex. 6 at 32; Ex. 12 at DHS 020088; Ex. 27 at 102:4-103:16, 140:4-141:20, 142:23-143:7, 158:11-159:1; Ex. 38 at 124:6-16
15	Nothenberg Decl. ¶ 20	Pls.' Mem. for Summ. J. Ex. 1 at i, 3, 25-26; Ex. 12 at DHS 020088; Ex. 27 at 102:4-103:16
15	Nothenberg Decl. ¶¶ 21-31	Ex. C [Period Two Monitoring Rpt] at 18-19, 24, 26-29; Ex. D [Period One Monitoring Rpt] at 35-37; Ex. F [Settlement Agreement] §§ II.A.2.a, II.A.2.b; Ex. G [Period One IP] § I.2.a-b; Ex. H [Period Two IP] § I.2.c
16	Nothenberg Decl. ¶ 29	Ex. C [Period Two Monitoring Rpt] at 26-27
17	Nothenberg Decl. ¶¶ 25-26	Ex. C [Period Two Monitoring Rpt] at 18, 24; Ex. D [Period One Monitoring Rpt] at 36-37; Ex. H [Period Two IP] § I.2.c

17	<i>Id.</i> ¶¶ 32-35	Am. Compl. ¶¶ 162, 182, 183; Pls.' Mem. for Summ. J. Ex. 1 at ii; Ex. 6 at 32; Ex. 27 at 140:4-141:20, 142:23-143:7, 158:11-159:1; Ex. 38 at 124:6-16
18	Nothenberg Aff. ¶¶ 36-50	Pls.' Mem. Ex. C [Period Two Monitoring Rpt] at 30-32, 34-35, 36, 38-49, 60-64, 70-71; Ex. D [Period One Monitoring Rpt] at 39-45; Ex. F [Settlement Agreement] §§ II.A.2.c.4-6; Ex. G [Period One IP] § I; Ex. H [Period Two IP] §§ I.2.d, I.5.a, II.1; Ex. 8 to Nothenberg Decl. [Ex. E]
18	Nothenberg Decl. ¶¶ 43-44	Ex. C [Period Two Monitoring Rpt] at 36, 38-39, 48
21	Nothenberg Decl. ¶¶ 51-55	Am. Compl. ¶¶ 143-56, 166-69; Pls.' Mem. for Summ. J. Ex. 1 at ii; Ex. 4 at 24, 81-82; Ex. 6 at 44-48; Ex. 27 at 103:24-104:3; Ex. 41 at 190:23-191:4
23	Nothenberg Decl. ¶ 62	Ex. C [Period Two Monitoring Rpt] at 117, 131-32; Ex. H [Period Two IP] §§ II.7.j, II.14.c-f
23	Nothenberg Decl. ¶ 64	Ex. C [Period Two Monitoring Rpt] at 115, 117; Ex. F [Settlement Agreement] § II.B.10.a; Ex. H [Period Two IP] § II.7.a, II.7.f
24	Nothenberg Decl. ¶ 66	Pls.' Mem. for Summ. J. Ex. 4 at 3-4
24	Nothenberg Decl. ¶ 69	Ex. 3 to Nothenberg Decl. [Ex. E] at 45, 64, 66, 68-69
25	Nothenberg Decl. ¶¶ 76-78	Am. Compl. ¶¶ 171-77; Pls.' Mem. for Summ. J. Ex. 4 at 119-29, 131-42; Ex. 6 at 75-79, 83-86
27	Nothenberg Decl. ¶ 98	Pls.' Mem. for Summ. J. Ex. 1 at 13; Ex. 4 at 99-100; Ex. 28 at 205:4-206:5; Ex. 36 at 20:11-22; Ex. 40 at 34:7-35:3
31	Nothenberg Decl. ¶¶ 4-6	Ex. F [Settlement Agreement] §§ IIA.2, II.A.3, II.A.7, II.B.3, II.B.4, II.B.7, II.B.10, IV; <i>see generally</i> Ex. G [Period One IP]; Ex. H [Period Two IP]
32	Nothenberg Decl. ¶ 131	Ex. C [Period Two Monitoring Rpt] at 99-100; Ex. H [Period Two IP] § II.6.d
32	Nothenberg Decl. ¶123	Ex. C [Period Two Monitoring Rpt] at 78 n.281
33	Nothenberg Decl. ¶ 132	Ex. C [Period Two Monitoring Rpt] at 78 n.281
33	Nothenberg Decl. ¶126	Ex. C [Period Two Monitoring Rpt] at 103, 106 n.347
35	Nothenberg Decl. ¶ 136	Ex. C [Period Two Monitoring Rpt] at 133-34; Ex. F [Settlement Agreement] § III.D; Exhibit 7 to Nothenberg Decl. [Ex. E] at 14; Ex. 2 to Dobies Aff. [Ex. A]